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Lead-Liaison Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

**IN RE: MUSICAL INSTRUMENTS AND
EQUIPMENT ANTITRUST LITIGATION**

This Document Relates To:

ALL ACTIONS

Case No. 09-md-02121-LAB-POR

MDL No. 2121

CLASS ACTION

**JOINT MOTION FOR COURT
APPROVAL OF STIPULATION TO
EXTEND DEADLINE FOR
LIMITED DISCOVERY**

[NO HEARING REQUESTED]

DISCOVERY MATTER

Hon. Larry A. Burns, District Judge
Hon. Louisa S. Porter, Magistrate Judge

1 The parties, having met and conferred in good faith, **HEREBY AGREE AND STIPULATE**,
2 subject to court approval, to extend the date to complete the initial limited discovery described in the
3 Court's Order dated August 19, 2011 (Dkt. No. 45), from December 1, 2011, to **December 23, 2011**.

4 The requested extension is needed to enable Defendants to undertake the search and review
5 process and complete their document productions, to permit Plaintiffs a reasonable opportunity to
6 review Defendants' responses and document productions, and to allow Plaintiffs sufficient time to
7 schedule and complete depositions of key witnesses. The parties have not sought a previous extension
8 for discovery purposes.

9 The parties respectfully request the Court issue an order approving the stipulation and extending
10 the limited discovery deadline.

11
12 DATED: November 23, 2011

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19 Lead Liaison Counsel for Plaintiffs

20 DATED: November 23, 2011

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26 Attorneys for Defendant Guitar Center, Inc.

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1 DATED: November 23, 2011

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9 Music Merchants, Inc.

10 DATED: November 23, 2011

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18 DATED: November 23, 2011

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25 Attorneys for Defendants Fender Musical
26 Instruments Corp. and Kaman Music Corp. (now
27 known as KMC Music, Inc.)

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1 DATED: November 23, 2011

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14 Attorneys for Defendant Yamaha Corp. of America

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Dated: November 23, 2011

By: /s/ Elizabeth C. Pritzker

1 **CERTIFICATE OF SERVICE**

2 I, Elizabeth C. Pritzker, hereby certify that on November 23, 2011, I served the foregoing document
3 on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF
4 system. Any other counsel of record will be served by first class mail.

5
6 /s/ Elizabeth C. Pritzker